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6 Attorneys for Defendants  
7 TRULITE GLASS & ALUMINUM SOLUTIONS, LLC,  
HERBERT CORTEZ, SHAUN HANNA, AND STEVE  
8 WILLIAMS

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA  
11

12 LEE KIRK,

13 Plaintiff,

14 vs.

15 TRULITE GLASS & ALUMINUM  
SOLUTIONS, LLC, a Foreign Limited  
16 Liability Company, HERBERT CORTEZ,  
an Individual, STEVE WILLIAMS, an  
17 Individual, SHAUN HANNA, an  
Individual, DOES I-X; ROE  
18 CORPORATIONS I-X,

19 Defendants.  
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Case No. 2:18-CV-00043-JCM-GWF

**STIPULATION AND ~~PROPOSED~~ ORDER  
EXTENDING TIME FOR DEFENDANT  
STEVE WILLIAMS TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

**[FIRST REQUEST]**

21 Plaintiff LEE KIRK and Defendant STEVE WILLIAMS ("Williams"), by and through their  
22 undersigned counsel, hereby agree and stipulate to extend the time for Williams to file his response  
23 to Plaintiff's Complaint from its current deadline of **February 22, 2018** up to and including **March**  
24 **6, 2018**.

25 Insofar as Defendants' counsel was only recently retained to represent Williams in this  
26 matter, this extension is being requested in order to give Williams necessary additional time to look  
27 into Plaintiff's allegations against him and conduct the required diligence necessary to prepare and  
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1 file Williams's response to the Complaint. The requested March 6, 2018 response deadline is also  
2 presently the deadline set for the other Defendants in the case to respond to the Complaint.

3 This is the first request for an extension of time to respond to the Complaint made by  
4 Williams. This request is made in good faith and not for the purpose of delay.

5 Dated: February 15, 2018

Dated: February 15, 2018

6 Respectfully submitted,

Respectfully submitted,

7  
8 /s/ Jenny L. Foley

9 JENNY L. FOLEY, PH.D, ESQ.  
HKM EMPLOYMENT ATTORNEYS  
10 LLP

11 Attorneys for Plaintiff  
LEE KIRK

/s/ Montgomery Y. Paek

MONTGOMERY Y. PAEK, ESQ.  
TIMOTHY W. ROEHRS, ESQ.  
12 LITTLER MENDELSON, P.C.

13 Attorneys for Defendant  
TRULITE GLASS & ALUMINUM  
SOLUTIONS, LLC, HERBERT CORTEZ,  
14 SHAUN HANNA, and STEVE WILLIAMS

15 **ORDER**

16 **IT IS SO ORDERED.**

17 Dated: February 20, 2018.

18   
19 UNITED STATES MAGISTRATE JUDGE

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21 Firmwide:152692339.1 072120.1013  
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